

1 **INTERROGATORY 77**

2 If your response to Request 20 is anything other than an unqualified admission, SPECIFY
3 each DOCUMENT supporting your response.

4 **RESPONSE TO INTERROGATORY 77**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
7 already answered at least three hundred and twenty three (323) interrogatories propounded by
8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
11 confer as necessary.

12 **INTERROGATORY 78**

13 If your response to Request 20 is anything other than an unqualified admission, IDENTIFY
14 each person with knowledge supportive of your response.

15 **RESPONSE TO INTERROGATORY 78**

16 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
17 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
18 already answered at least three hundred and twenty three (323) interrogatories propounded by
19 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
20 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
21 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
22 confer as necessary.

23 **REQUEST 21**

24 Admit you have not RECORDED those occasions on which an EMPLOYEE missed a 10-
25 minute net REST BREAK during the CLASS PERIOD as a result of YOU “fail[ing] to provide” such
26 a break within the meaning of IWC Wage Order 7-2001, §12.

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1 **RESPONSE TO REQUEST 21**

2 Polo specifically objects to the request on the grounds that it is argumentative and not relevant
 3 to any claim or defense and is not likely to lead to any admissible evidence, and on the grounds that it
 4 is vague and ambiguous as to the phrases "missed a 10-minute net REST BREAK" and "as a result of
 5 YOU 'fail[ing] to provide' such a break". Defendant specifically objects on the grounds that the
 6 request seeks a legal conclusion. Defendant further specifically objects that this request presumes
 7 that rest breaks were not provided or made available, and/or that they were not provided or made
 8 available for the full allowable amount of time under the law. Based on the foregoing, Defendant
 9 denies the request.

10 **INTERROGATORY 79**

11 If your response to Request 21 is anything other than an unqualified admission, state all facts
 12 on which your response is based.

13 **RESPONSE TO INTERROGATORY 79**

14 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 15 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 16 already answered at least three hundred and twenty three (323) interrogatories propounded by
 17 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 18 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 19 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 20 confer as necessary.

21 **INTERROGATORY 80**

22 If your response to Request 21 is anything other than an unqualified admission, SPECIFY
 23 each DOCUMENT supporting your response.

24 **RESPONSE TO INTERROGATORY 80**

25 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 26 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 27 already answered at least three hundred and twenty three (323) interrogatories propounded by
 28 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 3 confer as necessary.

4 **INTERROGATORY 81**

5 If your response to Request 21 is anything other than an unqualified admission, IDENTIFY
 6 each person with knowledge supportive of your response.

7 **RESPONSE TO INTERROGATORY 81**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 10 already answered at least three hundred and twenty three (323) interrogatories propounded by
 11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 14 confer as necessary.

15 **REQUEST 22**

16 Admit that you did not take measures to ensure that staffing levels were sufficient for
 17 EMPLOYEES to be able to take REST BREAKS during the CLASS PERIOD.

18 **RESPONSE TO REQUEST 22**

19 Polo specifically objects to the request on the grounds that it is not relevant to any claim or
 20 defense and is not likely to lead to any admissible evidence, and on the grounds that it is vague and
 21 ambiguous as to the phrase "did not take measures to ensure". Subject to and without waiving the
 22 foregoing general and specific objections, and to the extent that Polo understands the request, Polo
 23 denies the request.

24 **INTERROGATORY 82**

25 If your response to Request 22 is anything other than an unqualified admission, describe in
 26 detail all measure you took to ensure that staffing levels were sufficient for EMPLOYEES to be able
 27 to take REST BREAKS during the CLASS PERIOD.

1 **RESPONSE TO INTERROGATORY 82**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 83**

10 If your response to Request 22 is anything other than an unqualified admission, SPECIFY
 11 each DOCUMENT supporting your response.

12 **RESPONSE TO INTERROGATORY 83**

13 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 14 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 15 already answered at least three hundred and twenty three (323) interrogatories propounded by
 16 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 17 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 18 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 19 confer as necessary.

20 **REQUEST 23**

21 Admit that, during the CLASS PERIOD, you relied on IWC Wage Order §3(D) to pay all
 22 California sales associates in your full-price stores as though they were exempt from the overtime
 23 provisions of IWC Wage Order §3(A)(1).

24 **RESPONSE TO REQUEST 23**

25 Polo specifically objects to the request on the grounds that it is vague and ambiguous as to the
 26 phrase "relied on" and "as though they were exempt from". Defendant further specifically objects on
 27 the grounds that the request seeks a legal conclusion. Based on the foregoing, Defendant lacks
 28 sufficient information to respond to this request and on that basis Defendant denies the request.

1 **INTERROGATORY 84**

2 If your response to Request 23 is anything other than an unqualified admission, state all facts
 3 on which your response is based.

4 **RESPONSE TO INTERROGATORY 84**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 7 already answered at least three hundred and twenty three (323) interrogatories propounded by
 8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 11 confer as necessary.

12 **INTERROGATORY 85**

13 If your response to Request 23 is anything other than an unqualified admission, SPECIFY
 14 each DOCUMENT supporting your response.

15 **RESPONSE TO INTERROGATORY 85**

16 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 17 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 18 already answered at least three hundred and twenty three (323) interrogatories propounded by
 19 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 20 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 21 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 22 confer as necessary.

23 **INTERROGATORY 86**

24 If your response to Request 23 is anything other than an unqualified admission, IDENTIFY
 25 each person with knowledge supportive of your response.

26 **RESPONSE TO INTERROGATORY 86**

27 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 28 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has

1 already answered at least three hundred and twenty three (323) interrogatories propounded by
 2 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 3 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 4 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 5 confer as necessary.

6 **REQUEST 24**

7 Admit that, during the CLASS PERIOD, you did not pay sales associates in your San
 8 Francisco store more than 1½ times the applicable minimum wage within the meaning of IWC Wage
 9 Order 7-2001, §3(D).

10 **RESPONSE TO REQUEST 24**

11 Polo specifically objects to the request on the grounds that it is vague and ambiguous as to the
 12 phrase “did not pay sales associates in your San Francisco store more than 1½ times the applicable
 13 minimum wage”. Polo further specifically objects to the extent this request requires a legal
 14 conclusion. Subject to and without waiving the foregoing general and specific objections, and to the
 15 extent that Polo understands the request, Polo denies the request.

16 **INTERROGATORY 87**

17 If your response to Request 24 is anything other than an unqualified admission, state all facts
 18 on which your response is based.

19 **RESPONSE TO INTERROGATORY 87**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 22 already answered at least three hundred and twenty three (323) interrogatories propounded by
 23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 26 confer as necessary.

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INTERROGATORY 88

If your response to Request 24 is anything other than an unqualified admission, SPECIFY each DOCUMENT supporting your response.

RESPONSE TO INTERROGATORY 88

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

INTERROGATORY 89

If your response to Request 24 is anything other than an unqualified admission, IDENTIFY each person with knowledge supportive of your response.

RESPONSE TO INTERROGATORY 89

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

REQUEST 25

Admit that you performed no RECONCILIATION with respect to California sales associates until 2007.

RESPONSE TO REQUEST 25

Polo specifically objects to the request on the grounds that it is vague and ambiguous as to the phrase "performed no RECONCILIATION". Subject to and without waiving the foregoing general

1 and specific objections, and to the extent that Polo understands the request, Polo admits the request.

2 **INTERROGATORY 90**

3 If your response to Request 25 is anything other than an unqualified admission, state all facts
4 on which your response is based.

5 **RESPONSE TO INTERROGATORY 90**

6 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
7 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
8 already answered at least three hundred and twenty three (323) interrogatories propounded by
9 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
10 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
11 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
12 confer as necessary.

13 **INTERROGATORY 91**

14 If your response to Request 25 is anything other than an unqualified admission, SPECIFY
15 each DOCUMENT supporting your response.

16 **RESPONSE TO INTERROGATORY 91**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
19 already answered at least three hundred and twenty three (323) interrogatories propounded by
20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
23 confer as necessary.

24 **INTERROGATORY 92**

25 If your response to Request 25 is anything other than an unqualified admission, IDENTIFY
26 each person with knowledge supportive of your response.

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1 **RESPONSE TO INTERROGATORY 92**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 93**

10 Describe in detail how you performed the RECONCILIATION applicable to California sales
 11 associates in 2007.

12 **RESPONSE TO INTERROGATORY 93**

13 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 14 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 15 already answered at least three hundred and twenty three (323) interrogatories propounded by
 16 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 17 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 18 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 19 confer as necessary.

20 **INTERROGATORY 94**

21 Describe in detail how, if at all, in 2007, you performed the RECONCILIATION applicable
 22 to California EMPLOYEES whose tenure with you was less than a year.

23 **RESPONSE TO INTERROGATORY 94**

24 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 25 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 26 already answered at least three hundred and twenty three (323) interrogatories propounded by
 27 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 28 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly

1 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
2 confer as necessary.

3 **REQUEST 26**

4 Admit that, between March 20, 2002 and the point at which you performed a
5 RECONCILIATION in approximately August of 2007, you took no measures to assess whether sales
6 associates in your California full-price stores treated as exempt pursuant to IWC Wage Order 7-2001,
7 §3(D), actually met the standards set forth therein.

8 **RESPONSE TO REQUEST 26**

9 Polo specifically objects to the request on the grounds that it is vague and ambiguous as to the
10 phrase "the point at which you performed a RECONCILIATION" and "took no measures to assess".
11 Defendant further specifically objects on the grounds that the request seeks a legal conclusion.
12 Subject to and without waiving the foregoing general and special objections, Defendant denies the
13 request.

14 **INTERROGATORY 95**

15 If your response to Request 26 is anything other than an unqualified admission, state all facts
16 on which your response is based.

17 **RESPONSE TO INTERROGATORY 95**

18 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
19 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
20 already answered at least three hundred and twenty three (323) interrogatories propounded by
21 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
22 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
23 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
24 confer as necessary.

25 **INTERROGATORY 96**

26 If your response to Request 26 is anything other than an unqualified admission, SPECIFY
27 each DOCUMENT supporting your response.

1 **RESPONSE TO INTERROGATORY 96**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 97**

10 If your response to Request 26 is anything other than an unqualified admission, IDENTIFY
 11 each person with knowledge supportive of your response.

12 **RESPONSE TO INTERROGATORY 97**

13 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 14 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 15 already answered at least three hundred and twenty three (323) interrogatories propounded by
 16 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 17 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 18 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 19 confer as necessary.

20 **INTERROGATORY 98**

21 IDENTIFY each sales associate who worked in a full-price store in California during the
 22 CLASS PERIOD to whom the provisions of subsections (A), (B), and (C) of IWC Wage Order 7-
 23 2001 did not apply because his or her earnings exceeded “one and one-half (1½) times the minimum
 24 wage” and “more than half of that employee’s compensation represent[ed] commissions,” within the
 25 meaning of IWC Wage Order 7-2001, §3(D).

26 **RESPONSE TO INTERROGATORY 98**

27 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 28 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has

1 already answered at least three hundred and twenty three (323) interrogatories propounded by
 2 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 3 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 4 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 5 confer as necessary.

6 **INTERROGATORY 99**

7 IDENTIFY each California sales associate whose commission-based earnings were debited
 8 pursuant to your ARREARS PRACTICES.

9 **RESPONSE TO INTERROGATORY 99**

10 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 11 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 12 already answered at least three hundred and twenty three (323) interrogatories propounded by
 13 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 14 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 15 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 16 confer as necessary.

17 **REQUEST 27**

18 Admit that none of the California sales associates whose commission-based earnings were
 19 debited pursuant to your ARREARS PRACTICES ever agreed in writing to have their earnings so
 20 debited.

21 **RESPONSE TO REQUEST 27**

22 Polo specifically objects to the request on the grounds that it is not relevant to any claim or
 23 defense and is not likely to lead to any admissible evidence, and on the grounds that it is vague,
 24 ambiguous and unintelligible to the phrase "commission-based earnings were debited" and "ever
 25 agreed in writing to have their earnings so debited". Based on the foregoing, Defendant lacks
 26 sufficient information to respond to this request and on that basis Defendant denies the request.

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1 **INTERROGATORY 100**

2 If your response to Request 27 is anything other than an unqualified admission, state all facts
 3 on which your response is based.

4 **RESPONSE TO INTERROGATORY 100**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 7 already answered at least three hundred and twenty three (323) interrogatories propounded by
 8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 11 confer as necessary.

12 **INTERROGATORY 101**

13 If your response to Request 27 is anything other than an unqualified admission, SPECIFY
 14 each DOCUMENT supporting your response.

15 **RESPONSE TO INTERROGATORY 101**

16 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 17 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 18 already answered at least three hundred and twenty three (323) interrogatories propounded by
 19 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 20 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 21 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 22 confer as necessary.

23 **INTERROGATORY 102**

24 If your response to Request 27 is anything other than an unqualified admission, IDENTIFY
 25 each person with knowledge supportive of your response.

26 **RESPONSE TO INTERROGATORY 102**

27 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 28 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has

1 already answered at least three hundred and twenty three (323) interrogatories propounded by
 2 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 3 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 4 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 5 confer as necessary.

6 **INTERROGATORY 103**

7 Explain in detail the relationships between and among Polo Ralph Lauren Corporation, Polo
 8 Retail, LLC, and Fashions Outlet of America, Inc., especially as those relationships apply to your
 9 stores in California.

10 **RESPONSE TO INTERROGATORY 103**

11 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 12 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 13 already answered at least three hundred and twenty three (323) interrogatories propounded by
 14 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 15 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 16 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 17 confer as necessary.

18 **INTERROGATORY 104**

19 State the total number of your former sales associates who worked for you in California for
 20 any length of time during the CLASS PERIOD.

21 **RESPONSE TO INTERROGATORY 104**

22 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 23 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 24 already answered at least three hundred and twenty three (323) interrogatories propounded by
 25 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 26 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 27 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 28 confer as necessary.

1 **INTERROGATORY 105**

2 State the total number of your former cashiers who worked for you in California for any
3 length of time during the CLASS PERIOD.

4 **RESPONSE TO INTERROGATORY 105**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
7 already answered at least three hundred and twenty three (323) interrogatories propounded by
8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
11 confer as necessary.

12 **INTERROGATORY 106**

13 State the total number of your customer service representatives who worked for you in
14 California for any length of time during the CLASS PERIOD.

15 **RESPONSE TO INTERROGATORY 106**

16 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
17 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
18 already answered at least three hundred and twenty three (323) interrogatories propounded by
19 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
20 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
21 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
22 confer as necessary.

23 **INTERROGATORY 107**

24 State the average daily amount of unpaid WAITING TIME experienced by CLASS
25 MEMBERS in your Rodeo Drive store in Beverly Hills, California during each of the years from
26 2002 through the present.

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1 **RESPONSE TO INTERROGATORY 107**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 108**

10 Describe in detail how you calculated your response to the prior interrogatory, including all
 11 assumptions you relied upon.

12 **RESPONSE TO INTERROGATORY 108**

13 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 14 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 15 already answered at least three hundred and twenty three (323) interrogatories propounded by
 16 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 17 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 18 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 19 confer as necessary.

20 **INTERROGATORY 109**

21 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 22 MEMBERS in your Burlingame Avenue store in Burlingame, California during each of the years
 23 from 2002 through the present.

24 **RESPONSE TO INTERROGATORY 109**

25 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 26 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 27 already answered at least three hundred and twenty three (323) interrogatories propounded by
 28 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 3 confer as necessary.

4 **INTERROGATORY 110**

5 Describe in detail how you calculated your response to the prior interrogatory, including all
 6 assumptions you relied upon.

7 **RESPONSE TO INTERROGATORY 110**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 10 already answered at least three hundred and twenty three (323) interrogatories propounded by
 11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 14 confer as necessary.

15 **INTERROGATORY 111**

16 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 17 MEMBERS in your South Coast Plaza store in Costa Mesa, California during each of the years from
 18 2002 through the present.

19 **RESPONSE TO INTERROGATORY 111**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 22 already answered at least three hundred and twenty three (323) interrogatories propounded by
 23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 26 confer as necessary.

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1 **INTERROGATORY 112**

2 Describe in detail how you calculated your response to the prior interrogatory, including all
3 assumptions you relied upon.

4 **RESPONSE TO INTERROGATORY 112**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
7 already answered at least three hundred and twenty three (323) interrogatories propounded by
8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
11 confer as necessary.

12 **INTERROGATORY 113**

13 State the average daily amount of unpaid WAITING TIME experienced by CLASS
14 MEMBERS in each of your Malibu, California stores during each of the years from 2002 through the
15 present.

16 **RESPONSE TO INTERROGATORY 113**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
19 already answered at least three hundred and twenty three (323) interrogatories propounded by
20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
23 confer as necessary.

24 **INTERROGATORY 114**

25 Describe in detail how you calculated your response to the prior interrogatory, including all
26 assumptions you relied upon.

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1 RESPONSE TO INTERROGATORY 114

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 INTERROGATORY 115

10 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 11 MEMBERS in your Palo Alto, California store (Store No. 409) during each of the years from 2002
 12 through the present.

13 RESPONSE TO INTERROGATORY 115

14 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 15 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 16 already answered at least three hundred and twenty three (323) interrogatories propounded by
 17 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 18 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 19 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 20 confer as necessary.

21 INTERROGATORY 116

22 Describe in detail how you calculated your response to the prior interrogatory, including all
 23 assumptions you relied upon.

24 RESPONSE TO INTERROGATORY 116

25 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 26 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 27 already answered at least three hundred and twenty three (323) interrogatories propounded by
 28 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 3 confer as necessary.

4 **INTERROGATORY 117**

5 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 6 MEMBERS in your Union Street Rugby store in San Francisco during each of the years from 2002
 7 through the present.

8 **RESPONSE TO INTERROGATORY 117**

9 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 10 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 11 already answered at least three hundred and twenty three (323) interrogatories propounded by
 12 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 13 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 14 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 15 confer as necessary.

16 **INTERROGATORY 118**

17 Describe in detail how you calculated your response to the prior interrogatory, including all
 18 assumptions you relied upon.

19 **RESPONSE TO INTERROGATORY 118**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 22 already answered at least three hundred and twenty three (323) interrogatories propounded by
 23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 26 confer as necessary.

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1 **INTERROGATORY 119**

2 State the average daily amount of unpaid WAITING TIME experienced by CLASS
3 MEMBERS in your Palo Alto, California store (Store No. 810), during each of the years from 2002
4 through the present.

5 **RESPONSE TO INTERROGATORY 119**

6 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
7 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
8 already answered at least three hundred and twenty three (323) interrogatories propounded by
9 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
10 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
11 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
12 confer as necessary.

13 **INTERROGATORY 120**

14 Describe in detail how you calculated your response to the prior interrogatory, including all
15 assumptions you relied upon.

16 **RESPONSE TO INTERROGATORY 120**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
19 already answered at least three hundred and twenty three (323) interrogatories propounded by
20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
23 confer as necessary.

24 **INTERROGATORY 121**

25 State the average daily amount of unpaid WAITING TIME experienced by CLASS
26 MEMBERS in your Palm Desert, California store during each of the years from 2002 through the
27 present.

1 **RESPONSE TO INTERROGATORY 121**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 122**

10 Describe in detail how you calculated your response to the prior interrogatory, including all
 11 assumptions you relied upon.

12 **RESPONSE TO INTERROGATORY 122**

13 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 14 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 15 already answered at least three hundred and twenty three (323) interrogatories propounded by
 16 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 17 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 18 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 19 confer as necessary.

20 **INTERROGATORY 123**

21 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 22 MEMBERS in your Post Street store in San Francisco, California during each of the years from 2002
 23 through the present.

24 **RESPONSE TO INTERROGATORY 123**

25 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 26 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 27 already answered at least three hundred and twenty three (323) interrogatories propounded by
 28 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 3 confer as necessary.

4 **INTERROGATORY 124**

5 Describe in detail how you calculated your response to the prior interrogatory, including all
 6 assumptions you relied upon.

7 **RESPONSE TO INTERROGATORY 124**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 10 already answered at least three hundred and twenty three (323) interrogatories propounded by
 11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 14 confer as necessary.

15 **INTERROGATORY 125**

16 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 17 MEMBERS in your Polo Ralph Lauren Factory Store in Alpine, California during each of the years
 18 from 2002 through the present.

19 **RESPONSE TO INTERROGATORY 125**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 22 already answered at least three hundred and twenty three (323) interrogatories propounded by
 23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 26 confer as necessary.

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1 **INTERROGATORY 126**

2 Describe in detail how you calculated your response to the prior interrogatory, including all
 3 assumptions you relied upon.

4 **RESPONSE TO INTERROGATORY 126**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 7 already answered at least three hundred and twenty three (323) interrogatories propounded by
 8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 11 confer as necessary.

12 **INTERROGATORY 127**

13 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 14 MEMBERS in your Polo Ralph Lauren Factory Store in Anderson, California during each of the
 15 years from 2002 through the present.

16 **RESPONSE TO INTERROGATORY 127**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 19 already answered at least three hundred and twenty three (323) interrogatories propounded by
 20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 23 confer as necessary.

24 **INTERROGATORY 128**

25 Describe in detail how you calculated your response to the prior interrogatory, including all
 26 assumptions you relied upon.

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1 **RESPONSE TO INTERROGATORY 128**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 129**

10 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 11 MEMBERS in your Polo Ralph Lauren Factory Store in Barstow, California during each of the years
 12 from 2002 through the present.

13 **RESPONSE TO INTERROGATORY 129**

14 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 15 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 16 already answered at least three hundred and twenty three (323) interrogatories propounded by
 17 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 18 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 19 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 20 confer as necessary.

21 **INTERROGATORY 130**

22 Describe in detail how you calculated your response to the prior interrogatory, including all
 23 assumptions you relied upon.

24 **RESPONSE TO INTERROGATORY 130**

25 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 26 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 27 already answered at least three hundred and twenty three (323) interrogatories propounded by
 28 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 3 confer as necessary.

4 **INTERROGATORY 131**

5 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 6 MEMBERS in each of your Cabazon, California stores during each of the years from 2002 through
 7 the present.

8 **RESPONSE TO INTERROGATORY 131**

9 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 10 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 11 already answered at least three hundred and twenty three (323) interrogatories propounded by
 12 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 13 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 14 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 15 confer as necessary.

16 **INTERROGATORY 132**

17 Describe in detail how you calculated your response to the prior interrogatory, including all
 18 assumptions you relied upon.

19 **RESPONSE TO INTERROGATORY 132**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 22 already answered at least three hundred and twenty three (323) interrogatories propounded by
 23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 26 confer as necessary.

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1 **INTERROGATORY 133**

2 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 3 MEMBERS in your Polo Ralph Lauren Factory Store in Camarillo, California during each of the
 4 years from 2002 through the present.

5 **RESPONSE TO INTERROGATORY 133**

6 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 7 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 8 already answered at least three hundred and twenty three (323) interrogatories propounded by
 9 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 10 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 11 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 12 confer as necessary.

13 **INTERROGATORY 134**

14 Describe in detail how you calculated your response to the prior interrogatory, including all
 15 assumptions you relied upon.

16 **RESPONSE TO INTERROGATORY 134**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 19 already answered at least three hundred and twenty three (323) interrogatories propounded by
 20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 23 confer as necessary.

24 **INTERROGATORY 135**

25 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 26 MEMBERS in your Polo Ralph Lauren Factory Store in Carlsbad, California, during each of the
 27 years from 2002 through the present.

1 **RESPONSE TO INTERROGATORY 135**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 136**

10 Describe in detail how you calculated your response to the prior interrogatory, including all
 11 assumptions you relied upon.

12 **RESPONSE TO INTERROGATORY 136**

13 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 14 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 15 already answered at least three hundred and twenty three (323) interrogatories propounded by
 16 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 17 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 18 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 19 confer as necessary.

20 **INTERROGATORY 137**

21 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 22 MEMBERS in your Polo Ralph Lauren Factory Store in Gilroy, California during each of the years
 23 from 2002 through the present.

24 **RESPONSE TO INTERROGATORY 137**

25 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 26 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 27 already answered at least three hundred and twenty three (323) interrogatories propounded by
 28 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 3 confer as necessary.

4 **INTERROGATORY 138**

5 Describe in detail how you calculated your response to the prior interrogatory, including all
 6 assumptions you relied upon.

7 **RESPONSE TO INTERROGATORY 138**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 10 already answered at least three hundred and twenty three (323) interrogatories propounded by
 11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 14 confer as necessary.

15 **INTERROGATORY 139**

16 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 17 MEMBERS in your Polo Ralph Lauren Factory Store in Mammoth Lakes, California during each of
 18 the years from 2002 through the present.

19 **RESPONSE TO INTERROGATORY 139**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 22 already answered at least three hundred and twenty three (323) interrogatories propounded by
 23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 26 confer as necessary.

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1 **INTERROGATORY 140**

2 Describe in detail how you calculated your response to the prior interrogatory, including all
3 assumptions you relied upon.

4 **RESPONSE TO INTERROGATORY 140**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
7 already answered at least three hundred and twenty three (323) interrogatories propounded by
8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
11 confer as necessary.

12 **INTERROGATORY 141**

13 State the average daily amount of unpaid WAITING TIME experienced by CLASS
14 MEMBERS in your Polo Ralph Lauren Factory Store in Ontario, California during each of the years
15 from 2002 through the present.

16 **RESPONSE TO INTERROGATORY 141**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
19 already answered at least three hundred and twenty three (323) interrogatories propounded by
20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
23 confer as necessary.

24 **INTERROGATORY 142**

25 Describe in detail how you calculated your response to the prior interrogatory, including all
26 assumptions you relied upon.

1 **RESPONSE TO INTERROGATORY 142**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 143**

10 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 11 MEMBERS in your Polo Ralph Lauren Factory Store in Pismo Beach, California, during each of the
 12 years from 2002 through the present.

13 **RESPONSE TO INTERROGATORY 143**

14 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 15 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 16 already answered at least three hundred and twenty three (323) interrogatories propounded by
 17 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 18 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 19 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 20 confer as necessary.

21 **INTERROGATORY 144**

22 Describe in detail how you calculated your response to the prior interrogatory, including all
 23 assumptions you relied upon.

24 **RESPONSE TO INTERROGATORY 144**

25 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 26 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 27 already answered at least three hundred and twenty three (323) interrogatories propounded by
 28 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
3 confer as necessary.

4 **INTERROGATORY 145**

5 State the average daily amount of unpaid WAITING TIME experienced by CLASS
6 MEMBERS in your Polo Ralph Lauren Factory Store in San Diego, California during each of the
7 years from 2002 through the present.

8 **RESPONSE TO INTERROGATORY 145**

9 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
10 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
11 already answered at least three hundred and twenty three (323) interrogatories propounded by
12 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

13 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
14 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
15 confer as necessary.

16 **INTERROGATORY 146**

17 Describe in detail how you calculated your response to the prior interrogatory, including all
18 assumptions you relied upon.

19 **RESPONSE TO INTERROGATORY 146**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
22 already answered at least three hundred and twenty three (323) interrogatories propounded by
23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
26 confer as necessary.

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INTERROGATORY 147

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Tulare, California during each of the years from 2002 through the present.

RESPONSE TO INTERROGATORY 147

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

INTERROGATORY 148

Describe in detail how you calculated your response to the prior interrogatory, including all assumptions you relied upon.

RESPONSE TO INTERROGATORY 148

Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has already answered at least three hundred and twenty three (323) interrogatories propounded by Plaintiffs in this action, including when this action was venued in San Francisco Superior Court. Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

INTERROGATORY 149

State the average daily amount of unpaid WAITING TIME experienced by CLASS MEMBERS in your Polo Ralph Lauren Factory Store in Vacaville, California during each of the years from 2002 through the present.

1 **RESPONSE TO INTERROGATORY 149**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 150**

10 Describe in detail how you calculated your response to the prior interrogatory, including all
 11 assumptions you relied upon.

12 **RESPONSE TO INTERROGATORY 150**

13 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 14 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 15 already answered at least three hundred and twenty three (323) interrogatories propounded by
 16 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 17 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 18 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 19 confer as necessary.

20 **INTERROGATORY 151**

21 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 22 MEMBERS in your Polo Ralph Lauren Children's Factory Store in Gilroy, California during each of
 23 the years from 2002 through the present.

24 **RESPONSE TO INTERROGATORY 151**

25 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 26 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 27 already answered at least three hundred and twenty three (323) interrogatories propounded by
 28 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.

1 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
2 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
3 confer as necessary.

4 **INTERROGATORY 152**

5 Describe in detail how you calculated your response to the prior interrogatory, including all
6 assumptions you relied upon.

7 **RESPONSE TO INTERROGATORY 152**

8 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
9 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
10 already answered at least three hundred and twenty three (323) interrogatories propounded by
11 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
12 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
13 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
14 confer as necessary.

15 **INTERROGATORY 153**

16 State the average daily amount of unpaid WAITING TIME experienced by CLASS
17 MEMBERS in your Polo Jeans Co. Factory Store in Camarillo, California, during each of the years
18 from 2002 through the present.

19 **RESPONSE TO INTERROGATORY 153**

20 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
21 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
22 already answered at least three hundred and twenty three (323) interrogatories propounded by
23 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
24 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
25 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
26 confer as necessary.

27

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1 **INTERROGATORY 154**

2 Describe in detail how you calculated your response to the prior interrogatory, including all
 3 assumptions you relied upon.

4 **RESPONSE TO INTERROGATORY 154**

5 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 6 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 7 already answered at least three hundred and twenty three (323) interrogatories propounded by
 8 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 9 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 10 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 11 confer as necessary.

12 **INTERROGATORY 155**

13 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 14 MEMBERS in your Polo Jeans Co. Factory Store in Gilroy, California during each of the years from
 15 2002 through the present.

16 **RESPONSE TO INTERROGATORY 155**

17 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 18 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 19 already answered at least three hundred and twenty three (323) interrogatories propounded by
 20 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 21 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 22 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 23 confer as necessary.

24 **INTERROGATORY 156**

25 Describe in detail how you calculated your response to the prior interrogatory, including all
 26 assumptions you relied upon.

27

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1 **RESPONSE TO INTERROGATORY 156**

2 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 3 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 4 already answered at least three hundred and twenty three (323) interrogatories propounded by
 5 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 6 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
 7 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
 8 confer as necessary.

9 **INTERROGATORY 157**

10 State the average daily amount of unpaid WAITING TIME experienced by CLASS
 11 MEMBERS in your Polo Jeans Co. Factory Store in San Diego, California during each of the years
 12 from 2002 through the present.

13 **RESPONSE TO INTERROGATORY 157**

14 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 15 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 16 already answered at least three hundred and five (352) interrogatories propounded by Plaintiffs in this
 17 action, including when this action was venued in San Francisco Superior Court. Polo objects that this
 18 interrogatory is burdensome and oppressive and is designed to needlessly increase the costs of
 19 litigation. Polo will not respond to this interrogatory, but is willing to meet and confer as necessary.

20 **INTERROGATORY 158**

21 Describe in detail how you calculated your response to the prior interrogatory, including all
 22 assumptions you relied upon.

23 **RESPONSE TO INTERROGATORY 158**

24 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
 25 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
 26 already answered at least three hundred and twenty three (323) interrogatories propounded by
 27 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
 28 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly

1 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
2 confer as necessary.

3 **INTERROGATORY 159**

4 Identify (by name, address and store number) each store at which any of your EMPLOYEES
5 has worked for you in California at any time since May 20, 2002.

6 **RESPONSE TO INTERROGATORY 159**

7 Polo objects to this interrogatory on the grounds that Plaintiffs exceed the allowable number
8 of interrogatories under Fed R. Civ. Proc. 33. Polo specifically objects on the grounds that it has
9 already answered at least three hundred and twenty three (323) interrogatories propounded by
10 Plaintiffs in this action, including when this action was venued in San Francisco Superior Court.
11 Polo objects that this interrogatory is burdensome and oppressive and is designed to needlessly
12 increase the costs of litigation. Polo will not respond to this interrogatory, but is willing to meet and
13 confer as necessary.

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15 Dated: August 28, 2008

GREENBERG TRAURIG, LLP

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By: William J. Goines
William J. Goines
Jeremy A. Meier
Alisha M. Louie

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Attorneys for Defendants Polo Ralph Lauren
Corporation; Polo Retail, LLC; Polo Ralph Lauren
Corporation, doing business in California as Polo
Retail Corporation; and Fashions Outlet of
America, Inc.